

August 3, 2005

Federal Election Commission
999 E Street Northwest
Washington, D.C. 20463

RECEIVED
FEC MAIL
OPERATIONS CENTER

2005 AUG 18 A 10: 03

RECEIVED
FEDERAL ELECTION
COMMISSION
OFFICE OF GENERAL
COUNSEL

2005 AUG 18 A 10: 50

Dear Commissioners:

In reviewing certain Federal Election Commission filings made for the 2004 North Dakota Senate campaign, I believe there are multiple violations contained in the filings of both the Senate campaign of Mike Liffriq, the Republican endorsed candidate from North Dakota, and a Political Action Committee, named "BullyPAC", headed by Ed Shafer.

I am writing to request that the Commission investigate these apparent violations, which are as follows:

1. The Liffriq Senate campaign purchased billboards from a company called Newman Sign Company (a/k/a Newman Outdoor Advertising) and reported payments to that company on their campaign reports that are far short of what was necessary to pay for the number of billboards that were put up in North Dakota by the campaign. Paying below the usual and normal charge for billboards would constitute an illegal corporate in-kind contribution, a violation of federal campaign finance law.

2. Newman signs acknowledged to the North Dakota Democratic Party in a telephone call that they are still owed a "substantial amount" of money from the Liffriq Campaign for the billboards that were displayed during the campaign, but this debt is not disclosed on any report filed by the Liffriq Senate campaign as required by law. Thus, if an outstanding debt exists, and the Liffriq Senate campaign failed to disclose it, this also is a serious violation of federal campaign finance law. In the event that the bill remains unpaid, it will, in effect, become an illegal corporate contribution to the Liffriq Campaign.

3. Bully PAC made a \$6,000 disbursement to Newman Signs on December 15, designating it as a partial payment for billboards for the Liffriq Campaign. This payment was an excessive contribution from BullyPAC, to the Liffriq Campaign. BullyPAC is not a "qualified" PAC and therefore by law could contribute no more than \$2,000 to the Liffriq Campaign at the time.

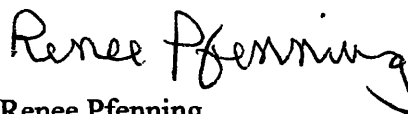
In addition, the payment by BullyPAC was made shortly after Harold Newman, the owner of Newman Signs, made a \$5,000 contribution to BullyPac. BullyPAC collected just \$9,400 during the entire campaign, with \$5,000 of it contributed by Harold Newman just days after the election. Mr. Newman's contribution allowed BullyPAC to make the payment to Newman Signs for the Liffriq Campaign. Mr. Newman had already contributed the maximum amount allowed by law to the Liffriq Campaign, so his contribution to BullyPAC on its face appears to have been "earmarked" for the Liffriq

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Campaign, which violates several campaign rules, including federal contribution limits. It appears, therefore, that BullyPAC solicited the owner of a business that was owed money by the Liffrog Campaign to make a campaign contribution to BullyPAC in order to move that money to the Liffrog campaign after the election.

This set of facts suggests that the Liffrog Campaign, as well as the BullyPAC, have likely violated a number of campaign finance laws. These are serious issues, and I urge you to investigate them and take appropriate actions. A formal Complaint detailing the various apparent violations accompanies this letter.

Sincerely,


Renee Pfenning

27044154879

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

Ms. Renee Pfenning

v.

Michael George Liffriq, Republican Candidate
for United States Senate from North Dakota
Liffriq for Senate, Ken Krumm, Treasurer
Bully PAC, Inc., Alyson Dietrich, Treasurer

MUR

5678

2005 AUG 18 A 11:00

FEDERAL ELECTION
COMMISSION
OFFICE OF THE
CLERK

COMPLAINT

1. This Complaint is filed by the undersigned Complainant with the Federal Election Commission ("FEC") pursuant to 2 U.S.C. § 437g(a)(1) and 11 C.F.R. § 111.4. The complaint is sworn to and signed by the Complainant, in the presence of a notary public, and is notarized. See below.

2. Complainant's address is Bismarck, North Dakota 58503.

3. The Complaint is filed against Michael George Liffriq. Mr. Liffriq was a candidate in the 2004 general election for the United States Senate from North Dakota. The Complaint is also filed against Mr. Liffriq's principal campaign committee, Liffriq for Senate, Ken Krumm, Treasurer. FEC ID S4ND00053. According to FEC records, Liffriq for Senate's current address is Mandan, North Dakota 58554 or P.O. Box 1433, Bismarck, North Dakota, 58502.

The Complaint is also filed against Bully PAC Inc. ("Bully PAC"), Alyson Dietrich, Treasurer. FEC ID C0038715. According to FEC records, Bully PAC is a non-

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party non-qualified committee with its current address listed as 551 Airport Road, Bismarck, North Dakota 58504.

4. Complainant alleges violations of 2 U.S.C. §§ 441a, 441b, 441f, and 434(b)(8) by Michael George Liffriq, Liffriq for Senate, and Bully PAC. More specifically, upon information and belief, Complainant alleges the following:

(i) That Liffriq for Senate paid less than the usual and normal charge for outdoor advertising, resulting in illegal in-kind corporate contributions from Newman Signs, Inc. in violation of 2 U.S.C. § 441b, and/or that Liffriq for Senate unlawfully failed to disclose outstanding debts to Newman Signs in violation of 2 U.S.C. § 434(b)(8);

(ii) That, through Bully PAC, Harold Newman (an executive/owner of Newman Signs) made excessive contributions in the name of another by earmarking a \$5,000 contribution to BullyPAC to pay Newman Signs for Liffriq for Senate's outstanding debt to the company in violation of 2 U.S.C. §§ 441a and 441f; and

(iii) That Bully PAC made and Liffriq for Senate accepted unlawful excessive contributions in violation of 2 U.S.C. §§ 441a.

A more detailed discussion of each allegation is provided below.

ILLEGAL IN-KIND CORPORATE CONTRIBUTIONS

5. According to documents filed with the FEC, Liffriq for Senate paid Newman Signs a total of \$26,616 in connection with the 2004 general election campaign for outdoor advertising signs (Exhibit 1).¹ Liffriq for Senate's reports to the FEC do not reflect any outstanding debt to Newman Signs. Complainant on information and belief understands that Liffriq for Senate purchased more than 30 billboards across the State of

¹ The mailing address of Newman Signs (also known as Newman Outdoor Advertising) is 1606 6th Avenue, SW, Jamestown, North Dakota 58402 according to a web-site maintained by the company.

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North Dakota from Newman Signs during the two-month period leading up to the 2004 general election. This indicates an average cost of \$444 per outdoor sign, per month. This is an unusually low figure. For comparison, the rate charged and paid by Dorgan for Senate (Mr. Liffbrig's opponent in the 2004 general election campaign) averaged \$1,250.00 per sign, per month. The extreme discrepancy suggests that Liffbrig for Senate was charged below the usual and normal charge by Newman Signs for outdoor advertising, resulting in a corporate in-kind contribution in violation of 2 U.S.C. § 441b, and/or that Liffbrig for Senate has failed to disclose its outstanding debt to Newman Signs in violation of 2 U.S.C. § 434(b) (8).

ILLEGAL EARMARKED CONTRIBUTIONS

According to reports filed with the FEC, Harold Newman, an owner/executive of Newman Signs, made a \$2,000 contribution to Liffbrig for Senate for the general election campaign on or about November 5, 2004 - the maximum amount an individual could lawfully contribute for the general election campaign. *See* Liffbrig for Senate, 2004 Post-General Election Report, Schedule A, p.18 of 51 (Exhibit 2). On or about November 16, 2004 (after the general election), Mr. Newman made a \$5,000 contribution to Bully PAC., a federal committee that is not associated with or authorized by any candidate or political party. *See* Bully PAC, Inc. 2004 Post-General Election Report, Schedule A, p.6 of 6 (Exhibit 3).

Shortly thereafter, Bully PAC made a \$6,000 disbursement to Newman Signs. More specifically, Bully PAC reported a December 15, 2004 payment to Newman Signs and describes it as "Given to Candidate: Liffbrig, Michael, Jr." *See* Bully PAC Inc. 2004 Year-End Report, Schedule B, p.7 of 7 (Exhibit 4).

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Mr. Newman's \$5,000 contribution to Bully PAC appears actually to have been an earmarked contribution to Liffrog for Senate. First, Bully PAC raised a total of just \$9,400 in 2004. Thus, without Mr. Newman's \$5,000 contribution, Bully PAC would not have been able to make its payment to Newman Signs.² Importantly, as previously explained, Liffrog for Senate appears to have owed Newman Signs a substantial amount for outdoor advertising expenses incurred throughout the general election, and the Company was pressing Liffrog for Senate for immediate payment. Mr. Newman would have been aware that he already had contributed the maximum amount allowed by law to Liffrog for Senate and, therefore, Bully PAC appears to have arranged to circumvent Mr. Newman's contribution limitation in order to subsidize Liffrog for Senate's outstanding debt to Newman Signs. By making an earmarked contribution through Bully PAC, Mr. Newman, Bully PAC, Liffrog for Senate and Mr. Liffrog violated the federal contribution limitation (2 U.S.C. § 441a) and a federal prohibition against making a contribution in the name of another (2 U.S.C. § 441f).

ACCEPTANCE OF EXCESSIVE CONTRIBUTIONS

In response to a notice of inquiry from the Federal Election Commission, Bully PAC recently admitted to making an excessive contribution in-kind to Liffrog for Senate and has asked Liffrog for Senate for a \$4,000 refund (Bully PAC is not a qualified committee and therefore may contribute no more than \$2,000 per candidate, per election). See Letter from Michael Hart stock, FEC, to Alyson Dietrich, Bully PAC (March 9,

² At the time Newman made his contribution to Bully PAC (Nov. 16, 2004), Bully PAC it had just a few hundred dollars in cash-on-hand. Several days later, North Dakota Governor John Hoeven and his wife each contributed \$2,000 to Bully PAC. But even with these funds, without Newman's contribution, Bully PAC would not have been able to make the \$6,000 payment to Newman Signs for Liffrog for Senate. Given that Mr. Newman must have known that Liffrog for Senate owed Newman Signs a substantial sum, it is difficult not to infer that he was making a contribution to Bully PAC with the understanding it would be used to pay-off part of Liffrog for Senate's debt to Newman Signs

2005) (Exhibit 5); and Electronic communications from Bully PAC to M.Hartstock, FEC (April 5, 2005) and Michael Liffriq, Liffriq for Senate (April 5, 2005) (available from FEC web-site containing images of financial reports filed by Bully PAC) (Exhibit 6). To date, however, no refund has been reported made by Liffriq for Senate and no outstanding debt or obligation is listed by Liffriq for Senate to Bully PAC (or to Newman Signs for that matter).

Moreover, even if Liffriq for Senate refunds Bully PAC for the excessive portion of its contribution, an excessive contribution still remains, because the entire amount of the in-kind contribution by Bully PAC to Liffriq for Senate was an earmarked contribution and therefore should be reflected as a contribution from Mr. Newman as well as Bully PAC. As Mr. Newman has already contributed the maximum lawful amount to Liffriq for Senate, he has made and Liffriq for Senate has accepted an excessive contribution.

COMPLAINANT:

8-3-05

Date

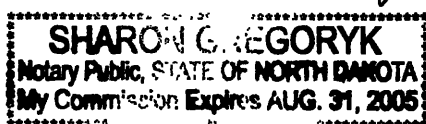
Renee M Pfenning

Renee Pfenning

Sworn to and subscribed before me on this 3rd ^{AUGUST} day of ~~July~~ 2005.

(NOTARY PUBLIC)

Sharon Gregoryk



27044154885

EXHIBIT 1

**SCHEDULE B (FEC Form 3)
ITEMIZED DISBURSEMENTS**Use separate schedule(s)
for each category of the
Detailed Summary PageFOR LINE NUMBER:
(check only one)

PAGE 51/98

<input checked="" type="checkbox"/> 17	<input type="checkbox"/> 18	<input type="checkbox"/> 19a	<input type="checkbox"/> 19b
20a	20b	20c	21

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee

NAME OF COMMITTEE (In Full)
Liffrig for Senate

Full Name (Last, First, Middle Initial)

A. Lee Wetzel

Mailing Address

City New Salem State ND Zip Code 58583

Purpose of Disbursement
magazine sub
Candidate Name001
Category/
TypeOffice Sought: House Senate President
Disbursement For: 2004
Primary X General
Other (specify) ☐
State: District

Transaction ID: 0000747

Date of Disbursement

07 09 2004

Amount of Each Disbursement this Period

20.00

Refund or Disposal of Excess
Contributions Required Under
11 C.F.R. 400.53

Full Name (Last, First, Middle Initial)

B. Image Printing, Inc

Mailing Address P.O. Box 596

City Bismarck State ND Zip Code 58502-1433

Purpose of Disbursement
teble bumper stickers
Candidate Name001
Category/
TypeOffice Sought: House Senate President
Disbursement For: 2004
Primary X General
Other (specify) ☐
State: District

Transaction ID: 0000744

Date of Disbursement

07 09 2004

Amount of Each Disbursement this Period

927.73

Refund or Disposal of Excess
Contributions Required Under
11 C.F.R. 400.53

Full Name (Last, First, Middle Initial)

C. Newman Outdoor

Mailing Address P.O. Box 84

City Minot State ND Zip Code 58702-0084

Purpose of Disbursement
bill boards adv
Candidate Name001
Category/
TypeOffice Sought: House Senate President
Disbursement For: 2004
Primary X General
Other (specify) ☐
State: District

Transaction ID: 0000754

Date of Disbursement

07 12 2004

Amount of Each Disbursement this Period

4688.00

Refund or Disposal of Excess
Contributions Required Under
11 C.F.R. 400.53

SUBTOTAL of Disbursements This Page (optional)

5635.73

TOTAL This Period (test page this line number only)

**SCHEDULE B (FEC Form 3)
ITEMIZED DISBURSEMENTS**Use separate schedule(s)
for each category of the
Detailed Summary PageFOR LINE NUMBER:
(check only one)

PAGE 94 / 96

<input checked="" type="checkbox"/> 17	<input type="checkbox"/> 18	<input type="checkbox"/> 19a	<input type="checkbox"/> 19b
<input type="checkbox"/> 20a	<input type="checkbox"/> 20b	<input type="checkbox"/> 20c	<input type="checkbox"/> 21

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NAME OF COMMITTEE (In Full)

Liffrig for Senate

Full Name (Last, First, Middle Initial)

A. Jenny Bienek

Mailing Address

City Fargo State ND Zip Code 58102

Purpose of Disbursement
cash reimbursement

Candidate Name

001
Category/
TypeOffice Sought: House Senate President
Disbursement For: 2004
Primary X General
Other (specify) ☐

State: District:

Transaction ID: 0001300

Date of Disbursement

09 / 22 / 2004

Amount of Each Disbursement this Period

79.24

Refund or Disposal of Excess
Contributions Required Under
11 C.F.R. 400.53

Full Name (Last, First, Middle Initial)

B. Jon Zahn

Mailing Address P. O. Box 21

City Maple Park State IL Zip Code 60161

Purpose of Disbursement
6500 sept

Candidate Name

001
Category/
TypeOffice Sought: House Senate President
Disbursement For: 2004
Primary X General
Other (specify) ☐

State: District:

Transaction ID: 0001498

Date of Disbursement

09 / 23 / 2004

Amount of Each Disbursement this Period

1500.00

Refund or Disposal of Excess
Contributions Required Under
11 C.F.R. 400.53

Full Name (Last, First, Middle Initial)

C. Newman Outdoor

Mailing Address P.O. Box 84

City Minot State ND Zip Code 58702-0084

Purpose of Disbursement
billboards

Candidate Name

001
Category/
TypeOffice Sought: House Senate President
Disbursement For: 2004
Primary X General
Other (specify) ☐

State: District:

Transaction ID: 0001499

Date of Disbursement

09 / 27 / 2004

Amount of Each Disbursement this Period

3000.00

Refund or Disposal of Excess
Contributions Required Under
11 C.F.R. 400.53

SUBTOTAL of Disbursements This Page (optional)

4579.24

TOTAL This Period (last page this line number only)

**SCHEDULE B (FEC Form 3)
ITEMIZED DISBURSEMENTS**

 Use separate schedule(s)
for each category of the
Detailed Summary Page

 FOR LINE NUMBER:
(check only one)

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<input checked="" type="checkbox"/> 17	<input type="checkbox"/> 18	<input type="checkbox"/> 19a	<input type="checkbox"/> 19b
<input type="checkbox"/> 20a	<input type="checkbox"/> 20b	<input type="checkbox"/> 20c	<input type="checkbox"/> 21

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NAME OF COMMITTEE (In Full)

Lifting for Senate

Full Name (Last, First, Middle Initial)

A. Newman Outdoor

Mailing Address PO Box 84

City

Minot

State

ND

Zip Code

58702-0084

Purpose of Disbursement
payment for bill boards

Candidate Name

 001
Category/
Type

Transaction ID: 0002112

Date of Disbursement

10 / 19 / 2004

Amount of Each Disbursement this Period

5000.00

 Refund or Disposal of Excess
Contributions Required Under
11 C.F.R. 400.53

Office Sought:

House

Senate

President

Disbursement For:

2004

Primary

☒ GeneralOther (specify) ☐

State:

District:

Full Name (Last, First, Middle Initial)

B. Mail Pro-Soft

Mailing Address 1335 - 2nd Avenue North

City

Fargo

State

ND

Zip Code

58102

Purpose of Disbursement
fundraising letter

Candidate Name

 003
Category/
Type

Transaction ID: 0002113

Date of Disbursement

10 / 21 / 2004

Amount of Each Disbursement this Period

928.00

 - Refund or Disposal of Excess
Contributions Required Under
11 C.F.R. 400.53

Office Sought:

House

Senate

President

Disbursement For:

2004

Primary

☒ GeneralOther (specify) ☐

State:

District:

Full Name (Last, First, Middle Initial)

C. Presort Plus

Mailing Address PO Box 1555

City

Bismarck

State

ND

Zip Code

58502-1555

Purpose of Disbursement
fundraising letter

Candidate Name

 003
Category/
Type

Transaction ID: 0002115

Date of Disbursement

10 / 21 / 2004

Amount of Each Disbursement this Period

504.32

 Refund or Disposal of Excess
Contributions Required Under
11 C.F.R. 400.53

Office Sought:

House

Senate

President

Disbursement For:

2004

Primary

☒ GeneralOther (specify) ☐

State:

District:

SUBTOTAL of Disbursements This Page (optional) ▶

6432.32

TOTAL This Period (last page this line number only) ▶

**SCHEDULE B (FEC Form 3)
ITEMIZED DISBURSEMENTS**

 Use separate schedule(s)
for each category of the
Detailed Summary Page

 FOR LINE NUMBER:
(check only one)

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<input checked="" type="checkbox"/> 17	<input type="checkbox"/> 18	<input type="checkbox"/> 19a	<input type="checkbox"/> 19b
<input type="checkbox"/> 20a	<input type="checkbox"/> 20b	<input type="checkbox"/> 20c	<input type="checkbox"/> 21

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NAME OF COMMITTEE (In Full)

Lifting for Senate

Full Name (Last, First, Middle Initial)

A. Nextel Communications

Mailing Address PO Box 17990

City	State	Zip Code
Denver	CO	80217-0990

Purpose of Disbursement	001 Category/ Type
Telephone land lines and cell phones	
Candidate Name	

Office Sought:	House	Disbursement For: 2004
	Senate	
	President	
State:	District:	Primary <input checked="" type="checkbox"/> General <input type="checkbox"/>
		Other (specify) <input type="checkbox"/>

Transaction ID: 0002129-001

Date of Disbursement

11 / 01 / 2004

Amount of Each Disbursement this Period

842.00

 Refund or Disposal of Excess
Contributions Required Under
11 C.F.R. 400.53
[MEMO ITEM]
MEMO

Full Name (Last, First, Middle Initial)

B. Dwight Grotberg

Mailing Address

City	State	Zip Code
Sanborn	ND	58480

Purpose of Disbursement	001 Category/ Type
Cash Reimbursements	
Candidate Name	

Office Sought:	House	Disbursement For: 2004
	Senate	
	President	
State:	District:	Primary <input checked="" type="checkbox"/> General <input type="checkbox"/>
		Other (specify) <input type="checkbox"/>

Transaction ID: 0002130

Date of Disbursement

11 / 01 / 2004

Amount of Each Disbursement this Period

928.00

 Refund or Disposal of Excess
Contributions Required Under
11 C.F.R. 400.53

ITEMIZATION BELOW

Full Name (Last, First, Middle Initial)

C. Newman Outdoor

Mailing Address PO Box 84

City	State	Zip Code
Minot	ND	58702-0084

Purpose of Disbursement	001 Category/ Type
Advertising	
Candidate Name	

Office Sought:	House	Disbursement For: 2004
	Senate	
	President	
State:	District:	Primary <input checked="" type="checkbox"/> General <input type="checkbox"/>
		Other (specify) <input type="checkbox"/>

Transaction ID: 0002130-001

Date of Disbursement

11 / 01 / 2004

Amount of Each Disbursement this Period

828.00

 Refund or Disposal of Excess
Contributions Required Under
11 C.F.R. 400.53
[MEMO ITEM]
MEMO

SUBTOTAL of Disbursements This Page (optional)

928.00

TOTAL This Period (last page this line number only)

**SCHEDULE B (FEC Form 3)
ITEMIZED DISBURSEMENTS**

 Use separate schedule(s)
for each category of the
Detailed Summary Page

 FOR LINE NUMBER.
(check only one)

PAGE 33 / 61

<input checked="" type="checkbox"/> 17	<input type="checkbox"/> 18	<input type="checkbox"/> 18a	<input type="checkbox"/> 19b
<input type="checkbox"/> 20a	<input type="checkbox"/> 20b	<input type="checkbox"/> 20c	<input type="checkbox"/> 21

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NAME OF COMMITTEE (In Full)

Liffrig for Senate

Full Name (Last, First, Middle Initial)

A. Newman Outdoor

Mailing Address PO Box 84

City
MinotState
NDZip Code
58702-0084Purpose of Disbursement
billboards

Candidate Name

001
Category/
TypeOffice Sought: House
Senate
PresidentDisbursement For: 2004
Primary X General
Other (specify) ☐

State: District:

Transaction ID: 0002131

Date of Disbursement

M M / D D / Y Y Y Y
11 / 04 / 2004

Amount of Each Disbursement this Period

13000.00

Refund or Disposal of Excess
Contributions Required Under
11 C.F.R. 400.83

Full Name (Last, First, Middle Initial)

B. Specials Delivery, Inc.

Mailing Address 2702 - 1st Avenue North

City
FargoState
NDZip Code
58102Purpose of Disbursement
coupon mailer

Candidate Name

008
Category/
TypeOffice Sought: House
Senate
PresidentDisbursement For: 2004
Primary X General
Other (specify) ☐

State: District:

Transaction ID: 0002132

Date of Disbursement

M M / D D / Y Y Y Y
11 / 08 / 2004

Amount of Each Disbursement this Period

2500.00

Refund or Disposal of Excess
Contributions Required Under
11 C.F.R. 400.53

Full Name (Last, First, Middle Initial)

C. MBNA

Mailing Address PO Box 15289

City
WilmingtonState
DEZip Code
19886-5289Purpose of Disbursement
Credit Cards

Candidate Name

001
Category/
TypeOffice Sought: House
Senate
PresidentDisbursement For: 2004
Primary X General
Other (specify) ☐

State: District:

Transaction ID: 0002133

Date of Disbursement

M M / D D / Y Y Y Y
11 / 08 / 2004

Amount of Each Disbursement this Period

10519.91

Refund or Disposal of Excess
Contributions Required Under
11 C.F.R. 400.53

ITEMIZATION BELOW

SUBTOTAL of Disbursements This Page (optional) ▶

28019.91

TOTAL This Period (last page this line number only) ▶

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EXHIBIT 2

SCHEDULE A (FEC Form 3)
ITEMIZED RECEIPTS

 Use separate schedule(s)
 or each category of the
 Detailed Summary Page

 FOR LINE NUMBER:
 (check only one)

PAGE 18/51

<input checked="" type="checkbox"/> 11a	<input type="checkbox"/> 11b	<input type="checkbox"/> 11c	<input type="checkbox"/> 11d
<input type="checkbox"/> 12	<input type="checkbox"/> 13a	<input type="checkbox"/> 13b	<input type="checkbox"/> 14
<input type="checkbox"/> 15			

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NAME OF COMMITTEE (In Full)

Lifting for Senate

Full Name (Last, First, Middle Initial)

A. Franklin Larson

Mailing Address

City

State

Zip Code

Valley City

ND

58072-9704

FEC ID number of contributing federal political committee.

C

Name of Employer

Occupation

Receipt For: 2004

Primary ☒ GeneralOther (specify) ☐Election Cycle-to-Date ☐

500.00

Date of Receipt

 M / D / Y Y Y Y
 11 / 04 / 2004

Transaction ID: 0002110

Amount of Each Receipt this Period

500.00

 Limit Increased Due to Opponent's
 Spending (2 U.S.C. 441a(i)(4)(A)-1)

Full Name (Last, First, Middle Initial)

B. Nancy L. Erickson

Mailing Address

City

State

Zip Code

Fargo

ND

58104

FEC ID number of contributing federal political committee.

C

Name of Employer

Occupation

Receipt For: 2004

Primary ☒ GeneralOther (specify) ☐Election Cycle-to-Date ☐

2000.00

Date of Receipt

 M / D / Y Y Y Y
 11 / 05 / 2004

Transaction ID: 0002140

Amount of Each Receipt this Period

2000.00

 Limit Increased Due to Opponent's
 Spending (2 U.S.C. 441a(i)(4)(A)-1)

Full Name (Last, First, Middle Initial)

C. Harold Newman

Mailing Address PO Box 172B

City

State

Zip Code

Jamestown

ND

58402-1728

FEC ID number of contributing federal political committee.

C

Name of Employer

Occupation

Receipt For: 2004

Primary ☒ GeneralOther (specify) ☐Election Cycle-to-Date ☐

2000.00

Date of Receipt

 M / D / Y Y Y Y
 11 / 05 / 2004

Transaction ID: 0002142

Amount of Each Receipt this Period

2000.00

 Limit Increased Due to Opponent's
 Spending (2 U.S.C. 441a(i)(4)(A)-1)

SUBTOTAL of Receipts This Page (optional)

4500.00

TOTAL This Period (last page this line number only)

19948.50

27044154893

EXHIBIT 3

SCHEDULE A (FEC Form 3X)
ITEMIZED RECEIPTS

Use separate schedule(s)
or each category of the
Detailed Summary Page

FOR LINE NUMBER: PAGE 6/6

(check only one)

☒ 11a ☐ 11b ☐ 11c ☐ 12
☐ 13 ☐ 14 ☐ 15 ☐ 16 ☐ 17

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

NAME OF COMMITTEE (In Full)
BULLY PAC INC

A. Full Name (Last, First, Middle Initial) Herold Newman Mailing Address P.O. Box 1728 City State Zip Code Jamestown ND 58402 FEC ID number of contributing federal political committee. C Name of Employer Self Occupation Business Owner Receipt For: Aggregate Year-to-Date ▼ Primary General Other (specify) ▼ 5000.00			Date of Receipt M / D / Y 11 / 16 / 2004 Transaction ID: SA11A1.4128 Amount of Each Receipt this Period 5000.00
B. Full Name (Last, First, Middle Initial) Kathleen Whitley Mailing Address City State Zip Code Fargo ND 58104 FEC ID number of contributing federal political committee. C Name of Employer Self Occupation Exercise Trainer Receipt For: Aggregate Year-to-Date ▼ Primary General Other (specify) ▼ 400.00			Date of Receipt M / D / Y 11 / 16 / 2004 Transaction ID: SA11A1.4131 Amount of Each Receipt this Period 400.00

SUBTOTAL of Receipts This Page (optional)	5400.00
TOTAL This Period (last page this line number only)	5400.00

27044154894

27044154895

EXHIBIT 4

**SCHEDULE B (FEC Form 3X)
ITEMIZED DISBURSEMENTS**

Use separate schedule(s)
for each category of the
Detailed Summary Page

FOR LINE NUMBER:
(check only one)

PAGE 7 / 7

<input type="checkbox"/> 21b	<input type="checkbox"/> 22	<input checked="" type="checkbox"/> 23	<input type="checkbox"/> 24	<input type="checkbox"/> 25	<input type="checkbox"/> 26
<input type="checkbox"/> 27	<input type="checkbox"/> 28a	<input type="checkbox"/> 28b	<input type="checkbox"/> 28c	<input type="checkbox"/> 29	<input type="checkbox"/> 30b

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NAME OF COMMITTEE (In Full)
BULLY PAC INC

A. Full Name (Last, First, Middle Initial)
Newman Signs, Inc.

Mailing Address 1608 6th Ave. SW

City Jamestown State ND Zip Code 58402

Purpose of Disbursement

Candidate Name
Mr. Michael Liffing

Office Sought: House
X Senate
President
State ND District

Disbursement For: 2004
Primary X General
Other (specify) ▼

004
Category/
Type

Transaction ID: SB23 4146
Date of Disbursement

12 / 15 / 2004

Amount of Each Disbursement this Period
6000.00

SUBTOTAL of Disbursements This Page (optional) ▶

6000.00

TOTAL This Period (last page this line number only) ▶

6000.00

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EXHIBIT 5



FEDERAL ELECTION COMMISSION
WASHINGTON D.C. 20463

RQ-2

March 9, 2005

Dietrich, Alyson Ms, Treasurer
Bully PAC Inc.
551 Airport Road
Bismarek, ND 58504

Response Due Date:
April 8, 2005

Identification Number: C00381715

Reference: 2004 Year-End Report (11/23/04 - 12/31/04)

Dear Ms. Dietrich:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. This notice requests information essential to full public disclosure of your federal election campaign finances. **An adequate response must be received at the Commission by the response date noted above. An itemization of the information needed follows:**

-Schedule B supporting Line 23 of your report discloses one or more contributions to a candidate(s) for the 2004 General election; however, the funds were disbursed after the election date(s) (see attached). Please note that contributions may not be designated for an election which has already occurred unless the funds are to be used to reduce a candidate committee's debts incurred during that election campaign.

If any apparently impermissible contribution in question was incompletely or incorrectly disclosed, you should amend your original report with clarifying information. If the contribution(s) in question should have been designated for debt retirement, you should amend your report to indicate "debt retirement," along with the year of election.

If you have made an impermissible contribution, you must request a refund or provide a written authorization for a redesignation of the contribution pursuant to 11 CFR §110.2(b) within 60 days of the treasurer's receipt.

If the foregoing conditions for redesignations were not met within 60 days of the treasurer's receipt, your committee must obtain a refund.

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BULLY PAC INC.

Page 2

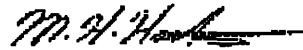
Please inform the Commission of your corrective action immediately in writing and provide a photocopy of the refund or redesignation request sent to the recipient committee(s). In addition, any refunds should be disclosed on Schedule A supporting Line 16 of the report covering the period during which they are received. Any redesignations should be disclosed as memo entries on Schedule B supporting Line 23 of the report covering the period during which the redesignation is made. 11 CFR §110.1(b)

Although the Commission may take further legal action regarding this impermissible activity, your prompt action in obtaining a refund and/or redesignating the contribution(s) will be taken into consideration.

Unlike previous election cycles, you will not receive an additional notice from the Commission on this matter. Adequate responses received on or before this date will be taken into consideration in determining whether audit action will be initiated. Requests for extensions of time in which to respond will not be considered. Failure to provide an adequate response by this date may result in an audit of the committee. Failure to comply with the provisions of the Act may also result in an enforcement action against the committee. Any response submitted by your committee will be placed on the public record and will be considered by the Commission prior to taking enforcement action.

Electronic filers must file amendments (to include statements, designations and reports) in an electronic format and must submit an amended report in its entirety, rather than just those portions of the report that are being amended. If you should have any questions regarding this matter or wish to verify the adequacy of your response, please contact me on our toll-free number (800) 424-9530 (at the prompt press 5 to reach the Reports Analysis Division) or my local number (202) 694-1398.

Sincerely,



Michael H. Hartsock
Campaign Finance Analyst
Reports Analysis Division

BULLY PAC INC.

Page 3

Recipient Name	Date	Amount	Election	Election State - Date
Mr. Michael Liffrig	12/15/04	\$6,000	G2004	ND - 11/02/04

27044154900

27044154901

EXHIBIT 6

ETEXT ATTACHMENT

04/05/2005 20 : 44

Dear FEC

Per your request BULLY! PAC has amended its year-end report to reflect the contribution to Michael Liffing was for debt reduction

In addition, a letter was sent requesting refund of the excess amount paid to his campaign over BULLY! PAC's allowable amount

The letter requesting the reimbursement is replicated below

April 5, 2005

Michael Liffing

Mandan, ND 58554

Dear Mr. Liffing

It has come to our attention that BULLY! PAC has contributed in excess of its allowable amount to your campaign. As required by the Federal Election Commission, we are requesting reimbursement in the amount of \$4,000 of the \$6,000 BULLY! PAC contributed to your campaign. This is necessary to comply with all of the rules and regulations promulgated by the Commission.

Please remit the reimbursement to

BULLY! PAC

551 Airport Road,

Bismarck, ND 58504

Thank you and we are sorry for any inconvenience

Sincerely,

Alyson Dietrich

Treasure

BULLY! PAC

27044154902